



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 22, 2021

By ECF and EMAIL

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York, 10007

Re: United States v. Guillermo Perez, S3 19 Cr. 781 (PKC)

Dear Judge Castel:

The Government writes to respectfully request that the Court order that defendant Guillermo Perez's release be continued upon the same bail conditions set at the time of his presentment in the Southern District of Texas, and that a new appearance bond reflecting those conditions be entered in this district. The Government understands from Pretrial Services that it is necessary to have a bond entered in this district for Pretrial Services to appropriately coordinate pretrial supervision with the Pretrial Services office in the defendant's district of residence.

The defendant was arrested in Houston, Texas on June 9, 2021 and presented in the Southern District of Texas on June 10, 2021, at which time the following conditions were set for his release:

- A \$100,000 unsecured personal recognizance bond, with one financially responsible co-signer;
- The defendant was placed in the custody of his father, Guillermo Perez, who resides at 9530 Fairdale Lane in Houston, Texas 77063;
- Regular supervision by Pretrial Services;
- Surrender of his passport;
- Not obtain a new passport or other international travel documents;
- Travel limited to Harris County, Texas and its surrounding counties, and the Southern District of New York;
- Avoid all contact with any potential witnesses in this prosecution;
- No possession of any firearm, destructive device, or other dangerous weapon;
- No possession of any narcotic drug or other controlled substance, unless prescribed by a licensed medical practitioner;
- Submit to drug testing at the request of Pretrial Services;
- Report to Pretrial Services any contact with law enforcement personnel, including arrests, questioning, or traffic stops;

Defendant Guillermo Perez is released upon the same terms and conditions set in the S.D. Texas / or set in the S.D. NY to wit, those set forth in the letter of July 22, 2021.  
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- Not to have access to the personal information of others; and
  - Not to open any new bank accounts without preapproval from Pretrial Services.

A copy of the Perez's appearance bond from the Southern District of Texas, which includes all of the above-listed conditions, is attached hereto as Exhibit A.

The defendant appeared remotely via telephone for arraignment and an initial pretrial conference on June 22, 2021. The conditions of his release were not addressed during that conference. Accordingly, the Government respectfully requests that the Court order the defendant's release continued upon the same conditions set in the Southern District of Texas.

We have conferred with defense counsel, who consents to this request.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By: \_\_\_\_\_ /s/  
Emily Deininger/ Tara M. La Morte/  
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(212) 637-2472 / 1041

cc: Alexander Houthuijzen, Esq. (by email)